

6-638715

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION

-----)	
MAERSK INC., as agents for)	
A.P. MOLLER-MAERSK A/S,)	
)	
Plaintiff,)	
)	
- against -)	CIVIL COMPLAINT
)	<u>IN ADMIRALTY</u>
)	
A-1 SPECIALIZED SERVICES &)	
SUPPLIES, INC. ,)	
)	
Defendant.)	
-----)	

Plaintiff, MAERSK INC., as agents for A.P. MOLLER-MAERSK A/S, by its attorneys the LAW OFFICES OF PATRICK G. MURPHY, as and for its Complaint against defendant A-1 SPECIALIZED SERVICES & SUPPLIES, INC., in personam, in a cause of action civil and maritime, alleges upon information and belief:

1. This is an admiralty and maritime claim within the meaning of Rule 9(h) of the Federal Rules of Civil Procedure, and the Shipping Act of 1984, as Amended, 46 U.S.C. App. Section 1701, et seq.

2. At all times hereinafter mentioned, plaintiff, MAERSK INC., as agents for A.P. MOLLER-MAERSK A/S was and still is a corporation organized and existing under the laws of the State of Delaware, with offices and a place of business at 9300 Arrowpoint Blvd., Charlotte, NC 28273.

3. Upon information and belief and at all times hereinafter mentioned, defendant had and now has the legal status and place of business at

set forth in Schedule A.

4. On or about the dates and at the ports of shipment stated in Schedule A, certain goods were delivered to plaintiff to be carried to the ports of destination.

5. Thereafter, the said goods were transported to the ports of destination and delivered to the defendant and/or its agents.

6. Defendant, as consignee on the Bills of Lading, was responsible to remove the containers within the available free time from the port of destination, but failed to do so, incurring demurrage charges, and also had Multi Stop Service charges, in the amount of \$16,285.57, as set forth in Schedule A, hereto.

7. Plaintiff has performed all acts required to be performed by plaintiff.

8. Defendant has failed and refused and continues to fail and to refuse to remit payment of \$16,285.57, although duly demanded.

9. By reason of the foregoing, plaintiff has sustained damages in the amount of \$16,285.57 which, although duly demanded, have not been paid.

WHEREFORE, plaintiff prays:

1. For judgment in the amount of plaintiff's damages, together with interest thereon from the respective dates due, costs, disbursements, and reasonable attorney's fees.

2. That process in due form of law according to the practice of this Court in cases of admiralty and maritime jurisdiction may issue against the defendant citing it to appear and answer all the singular matters aforesaid.

3. That plaintiff have such other and further relief in the premises
as in law and justice it may be entitled to receive.

Dated: Blue Bell, Pennsylvania
February 5, 2104

LAW OFFICES OF PATRICK G. MURPHY

By 

Patrick G. Murphy
Attorneys for Plaintiff
MAERSK INC., as agents for
A.P. MOLLER-MAERSK A/S
350 Sentry Parkway
Building 640, Suite 100
Blue Bell, PA 19422
(215) 643-6500

OF COUNSEL:
LAW OFFICES OF
ALBERT J. AVALLONE & ASSOCIATES

SCHEDULE A

I. Defendant's status & address:

A. Upon information and belief and at all times hereinafter mentioned, defendant A-1 SPECILAIZED SERVICES & SUPPLIES, INC. was and still is a Ccorporation organized and existing under the Laws of the State of Pennsylvania, with offices and a place of business at 2707 State Road, Crodon, PA.19021-0270.

II. Details of shipment(s):

1. Bill of Lading 555771576 dated 1/13/13 (Ex. A), and demurrage Invoice No. 5245373421 of 3/8/13 for \$2,470.00 (Ex. B)

Amount Paid: \$0

Amount Due: \$2,470.00

2. Bill of Lading 555708766 of 12/20/11 (Ex. C), and Invoice No. 5245874657 of 7/12/12 for Multi Stop Service totalling \$442.57 (Ex. D), and Invoice No. 5246493800 of 12/19/12 for demurrage totalling \$2,470.00 (Ex. E).

Amount Paid: \$0


Amount Due: \$2,912.57

3. Bill of Lading 863752096 dated 4/8/12 (Exhibit F), and Invoice No. 5245934961 of 7/27/12 for Multi Stop Service totalling \$683.00 (Ex. G), and Invoice No. 5245997992 of 8/14/12 for demurrage charges totalling \$10,220.00 (Ex. H.)

Amount Paid: \$0

Amount Due: \$10,903.00

III. TOTAL AMOUNT DUE: \$16,285.57

 MAERSK LINE		NON-NEGOTIABLE WAYBILL		SCAC MAEU
				B/L No. 555771576
Shipper AWADA TRADING CO ATC BEALBAK DOURIS MAIN ROAD KIA MOTORS BLG GR FLR Beirut 1 Lebanon		Booking No. 555771576		
Consignee A1 SPECIALIZED SERVICES Croydon PA 19021 United States 270		Export references H00632		Svc Contract
Notify Party JOHN A STEER AND COMPANY 331 MAIN STREET METUCHEN, NJ 08840 TEL : 732-205-8283 FAX : 732-205-8328		This contract is subject to the terms and conditions, including the law & jurisdiction clause and limitation of liability & declared value clauses, of the current Maersk Line Bill of Lading (available from the carrier, its agents and at www.maerskline.com), which are applicable with logical amendments (mutatis mutandis). To the extent necessary to enable the Consignee to sue and to be sued under this contract, the Shipper on entering into this contract does so on his own behalf and as agent for and on behalf of the Consignee and warrants that he has the authority to do so. The shipper shall be entitled to change the Consignee at any time before delivery of the goods provided he gives the Carrier reasonable notice in writing. Delivery will be made to the Consignee or his authorised agent on production of reasonable proof of identity (and, in the case of an agent, reasonable proof of authority) without production of this waybill. The Carrier shall be under no liability whatsoever for misdelivery unless caused by the Carrier's negligence.		
		Onward inland routing (Not part of Carriage as defined in clause 1. For account and risk of Merchant)		
Vessel MAERSK MISSOURI	Voyage 1202	Place of Receipt. Applicable only when document used as Multimodal Waybill		
Port of Loading Jebel Ali Dubai	Port of Discharge Newark	Place of Delivery. Applicable only when document used as Multimodal Waybill Croydon		

PARTICULARS FURNISHED BY SHIPPER

Kind of Packages; Description of goods; Marks and Numbers; Container No./Seal No. 1 Container Said to Contain 4500 PIECES SCRAP CATALYTIC CONVERTERS PONU0643091 ML-AE1292656 20 DRY 8'6 4500 PIECES 15800.000 KGS 34.0000 CBM SHIPPER'S LOAD, STOW, WEIGHT AND COUNT FREIGHT COLLECT CY/SD	Weight 15800.000 KGS	Measurement 34.0000 CBM
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Above particulars as declared by Shipper, but without responsibility of or representation by Carrier.

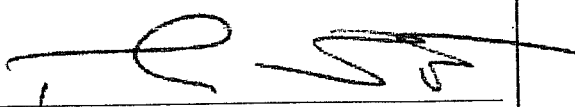

Freight & Charges	Rate	Unit	Currency	Prepaid	Collect
Carrier's Receipt. Total number of containers or packages received by Carrier. 1 container					
Shipped on Board Date (Local Time) 2011-12-16		Date Issue of Waybill 2012-01-13		Shipped, as far as ascertained by reasonable means of checking, in apparent good order and condition unless otherwise stated herein the total number or quantity of Containers or other packages or units indicated in the box opposite entitled "Carrier's Receipt"	
Declared Value Charges (see clause 7.3 of the Maersk Line Bill of Lading) for Declared Value of US\$					
Signed for the Carrier A.P. Møller - Maersk trading as Maersk Line  Maersk Agency U.S.A., Inc - Charlotte CRC As Agent(s) for the Carrier					

EXHIBIT "A"

 MAERSK LINE		NON-NEGOTIABLE WAYBILL	SCAC MAEU B/L No. 555771576
Shipper AWADA TRADING CO ATC BEALBAK DOURIS MAIN ROAD KIA MOTORS BLG GR FLR Beirut 1 Lebanon		Booking No. 555771576	Src Contract
Consignee A1 SPECIALIZED SERVICES Croydon PA 19021 United States 270		Export references H00632	
Notify Party JOHN A STEER AND COMPANY 331 MAIN STREET METUCHEN, NJ 08840 TEL : 732-205-8283 FAX : 732-205-8328		This contract is subject to the terms and conditions, including the law & jurisdiction clause and limitation of liability & declared value clauses, of the current Maersk Line Bill of Lading (available from the carrier, its agents and at www.maerskline.com), which are applicable with logical amendments (mutatis mutandis). To the extent necessary to enable the Consignee to sue and to be sued under this contract, the Shipper on entering into this contract does so on his own behalf and as agent for and on behalf of the Consignee and warrants that he has the authority to do so. The shipper shall be entitled to change the Consignee at any time before delivery of the goods provided he gives the Carrier reasonable notice in writing. Delivery will be made to the Consignee or his authorised agent on production of reasonable proof of identity (and, in the case of an agent, reasonable proof of authority) without production of this waybill. The Carrier shall be under no liability whatsoever for misdelivery unless caused by the Carrier's negligence.	
Vessel MAERSK MISSOURI		Voyage 1202	Place of Receipt. Applicable only when document used as Multimodal Waybill
Port of Loading Jebel Ali Dubai	Port of Discharge Newark	Place of Delivery. Applicable only when document used as Multimodal Waybill Croydon	

PARTICULARS FURNISHED BY SHIPPER

Kind of Packages; Description of goods; Marks and Numbers; Container No./Seal No.	Weight	Measurement
1 Container Said to Contain 4500 PIECES SCRAP CATALYTIC CONVERTERS PONU0643091 ML-AE1292656 20 DRY 8'6 4500 PIECES 15800.000 KGS 34.0000 CBM SHIPPER'S LOAD, STOW, WEIGHT AND COUNT FREIGHT COLLECT CY/SD	15800.000 KGS	34.0000 CBM

Above particulars as declared by Shipper, but without responsibility of or representation by Carrier.


Above particulars as declared by Shipper, but without responsibility of or representation by Carrier.					
Freight & Charges	Rate	Unit	Currency	Prepaid	Collect
Basic Ocean Freight	1300.00	Per Container	USD		1300.00
Inland Haulage Import	460.00	Per Container	USD		460.00
Bunker Adjustment Factor	410.00	Per Container	USD		410.00
Submission of Cargo Declarat	25.00	Per Bill of Lading	USD		25.00
Handling Charge - Destination	390.00	Per Contalner	USD		390.00
Equipment Management Fee	15.00	Per Container	AED		15.00
Emergency Risk Surcharge	100.00	Per Container	USD		100.00
Import Intermodal Fuel Surch	104.00	Per Container	USD		104.00
Carrier's Receipt: Total number of containers or packages received by Carrier. 1 container	Place of Issue of Waybill Charlotte		Shipped, as far as ascertained by reasonable means of checking, in apparent good order and condition unless otherwise stated herein the total number or quantity of Containers or other packages or units indicated in the box opposite entitled "Carrier's Receipt"		
Shipped on Board Date (Local Time) 2011-12-16	Date Issue of Waybill 2012-01-13				
Declared Value Charges (see clause 7.3 of the Maersk Line Bill of Lading) for Declared Value of US\$					

Signed for the Carrier A.P. Moller - Maersk trading as Maersk Line

Maersk Agency U.S.A., Inc - Charlotte CRC
As Agent(s) for the Carrier

This transport document has one or more numbered pages

Freight & Charges	Rate	Unit	Currency	Prepaid	Collect
Documentation Fee - Origin	300.00	Per Bill of Lading	AED		300.00
Handling Charge - Origin	793.00	Per Container	AED		793.00
Port Security Charge - Import	5.00	Per Container	USD		5.00
Peak Season Surcharge	300.00	Per Container	USD		300.00
Carrier Security Charge	9.00	Per Container	USD		9.00
Suez Transit Fee	25.00	Per Container	USD		25.00
Total AED			AED		1108.00
Total USD			USD		3128.00


**MAERSK
LINE**

 MAERSK LINE
 9300 ARROWPOINT BOULEVARD
 CHARLOTTE NC 28273-8136

Original

DETENTION INVOICE Number: 5245373421

Bill to :	A1 SPECIALIZED SERVICES PO Box 270 CROYDON PA 19021	Invoice Date:	03-08-2012
		Due Date:	03-08-2012
		Payment terms:	Payable immediately
Attention to:	DET/DEM ACCOUNTS PAYABLE	Our Contact:	Gaither, Brunetta
On behalf of :	A1 SPECIALIZED SERVICES PO Box 270 CROYDON PA 19021	Our Telephone:	1-800-768-8714

Customer No: USS4018333

Maersk Agency U.S.A., Inc. as agent for carrier A.P. Moller Maersk A/S
 Esplanaden 50, DK 1098 Copenhagen K, Denmark.
 Trading under the name Maersk Line, VAT No: DK53139655

Total Amount Due			
Condition	Rate	Base Value	Total(USD)
Net value			2,470.00
0% Non EU services VAT	0.00 %	2,470.00	0.00
Amount Due			2,470.00

Bill of Lading Number: 555771576

Origin	Destination	Vessel	Voyage
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Description	Container	Type	Start	End	Qty	UoM	ROE	Total(USD)
Freetime			01-11-2012	01-18-2012	0			
Detention Fee - Import	PONU0643091		01-19-2012	02-09-2012	1	CNT	1.00000	2,470.00
No of days billed 22 Service contract Number NA Route Code M3								

Total Due: 2,470.00

* Service Contract Number:


* For proper application of your funds, include a copy of your Maersk invoice(s) or bill of lading number(s) with your payment.
 For electronic payments, please forward your remittance information via email to NAMFRCSVCACH@maersk.com.

* Bank: Bank of America

Account Information:

Wire Only- ABA: 026009593

Account: 4426928403

EXHIBIT 



MAERSK
LINE

MAERSK LINE
9300 ARROWPOINT BOULEVARD
CHARLOTTE NC 28273-8136


DETENTION INVOICE Number: 5245373421

ACH Only- ABA: 111000012

Account: 4426928403

* If paying by check, please remit payment to:

Maersk Line
Attention: Payment Services - 3rd Floor South
9300 Arrowpoint Blvd
Charlotte, NC 28273-8136

 MAERSK LINE		NON-NEGOTIABLE WAYBILL		SCAC MAEU
				B/L No. 555708766
Shipper AWADA TRADING CO ATC BEALBAK DOURIS MAIN ROAD KIA MOTORS BLG GR FLR Beirut, 1 Lebanon		Booking No. 555708766		
Consignee A1 SPECIALIZED SERVICES PO BOX 270 CROYDON PA 19021 Croydon 19021 PA		Export references		Svc Contract
Notify Party John A Steer and co. 331 main street Metuchen , NJ. 08840. Tel:732 205 8283. Fax:732 205 8328.		This contract is subject to the terms and conditions, including the law & jurisdiction clause and limitation of liability & declared value clauses, of the current Maersk Line Bill of Lading (available from the carrier, its agents and at www.maerskline.com), which are applicable with logical amendments (mutatis mutandis). To the extent necessary to enable the Consignee to sue and to be sued under this contract, the Shipper on entering into this contract does so on his own behalf and as agent for and on behalf of the Consignee and warrants that he has the authority to do so. The shipper shall be entitled to change the Consignee at any time before delivery of the goods provided he gives the Carrier reasonable notice in writing. Delivery will be made to the Consignee or his authorised agent on production of reasonable proof of identity (and, in the case of an agent, reasonable proof of authority) without production of this waybill. The Carrier shall be under no liability whatsoever for misdelivery unless caused by the Carrier's negligence.		
Vessel MAERSK OHIO		Voyage 1202		Onward inland routing (Not part of Carriage as defined in clause 1. For account and risk of Merchant)
Port of Loading Jeddah		Port of Discharge Newark		Place of Receipt. Applicable only when document used as Multimodal Waybill
				Place of Delivery. Applicable only when document used as Multimodal Waybill Croydon

PARTICULARS FURNISHED BY SHIPPER

Kind of Packages; Description of goods; Marks and Numbers; Container No./Seal No.	Weight	Measurement
1 Container Said to Contain 5800 PCS CATALYTIC CONVERTERS FOR MELTING PURPOSE ONLY. NET WEIGHT : 15200 KGS MSKU2513306 ML-SA0622810 20 DRY 8'6 5800 PCS 16000.000 KGS 20.0000 CBM SHIPPER'S LOAD, STOW, WEIGHT AND COUNT FREIGHT COLLECT CY/SD	16000.000 KGS	20.0000 CBM

Above particulars as declared by Shipper, but without responsibility of or representation by Carrier.

Freight & Charges	Rate	Unit	Currency	Prepaid	Collect
Basic Ocean Freight	1940.00	Per Container	USD		1940.00
Inland Haulage Import	460.00	Per Container	USD		460.00
Bunker Adjustment Factor	410.00	Per Container	USD		410.00
Submission of Cargo Declaration	25.00	Per Bill of Lading	USD		25.00
Handling Charge - Destination	390.00	Per Container	USD		390.00
Detention Charge			SAR		300.00
Emergency Risk Surcharge	75.00	Per Container	USD		75.00
Import Intermodal Fuel Surcharge	104.00	Per Container	USD		104.00

Carrier's Receipt. Total number of containers or packages received by Carrier.

1 container

Shipped on Board Date (Local Time)

2011-12-20

Declared Value Charges (see clause 7.3 of the Maersk Line Bill of Lading) for Declared Value of US\$

Place of Issue of Waybill

The Woodlands

Date Issue of Waybill

Shipped, as far as ascertained by reasonable means of checking, in apparent good order and condition unless otherwise stated herein the total number or quantity of Containers or other packages or units indicated in the box opposite entitled "Carrier's Receipt"

Signed for the Carrier A.P. Møller - Maersk trading as Maersk Line

Maersk Agency U.S.A., Inc - Woodlands

As Agent(s) for the Carrier

This transport document has one or more numbered pages

EXHIBIT "C"

Freight & Charges	Rate	Unit	Currency	Prepaid	Collect
Manual Documentation Process	25.00	Per Bill of Lading	USD		25.00
Documentation Fee - Origin	100.00	Per Bill of Lading	SAR		100.00
Port Security Charge - Import	5.00	Per Container	USD		5.00
Peak Season Surcharge	300.00	Per Container	USD		300.00
Carrier Security Charge	9.00	Per Container	USD		9.00
Suez Transit Fee	25.00	Per Container	USD		25.00
Total SAR			SAR		400.00
Total USD			USD		3768.00



MAERSK

LINE

Maersk Agency U.S.A., Inc.
9300 Arrowpoint Boulevard
Charlotte NC 28273-8136

Original IMPORT INVOICE Number: 5245874657

Bill-to Party :	A1 SPECIALIZED SERVICES PO Box 270 CROYDON PA 19021	Invoice Date:	07-12-2012
		Due Date:	07-12-2012
		Payment terms:	Payable immediately
Attention of:	ACCOUNTS PAYABLE		
On behalf of :	A1 SPECIALIZED SERVICES PO Box 270 CROYDON PA 19021	Our Contact:	Wanda Crawford
		Our Telephone:	1-800-768-8714
Customer No:	USS4018333		

Maersk Agency U.S.A., Inc. as agent for carrier A.P. Moller Maersk A/S
Esplanaden 50, DK 1098 Copenhagen K, Denmark.
Trading under the name Maersk Line with below VAT number:
DK53139655 - applicable for exports to or imports from EU shipment (transactions not reported on EC Sales List)
DK12559410 - applicable for intra-EU or outside EU shipment (transactions reported on EC Sales List)

Total Amount Due

Condition	Rate	Base Value	Total(USD)
Net value			442.57
0% Non EU services VAT	0.00 %	442.57	0.00
Amount Due			442.57

Bill of Lading Number: 555708766

POL: Jeddah	Place of Receipt: Jeddah	Vessel/Voyage: MAERSK OHIO/1202
POD: Newark	Place of Delivery: Croydon	
ETD: 22-Dec-2011	ETA: 09-Jan-2012	

Description of Charges	Qty	UoM	Curr	Unit Price	ROE	Total(USD)
Multi Stop Service	1.000	BKG	USD	442.57	1.00000	442.57
Total Due:						442.57

No	Container No	Service	PCD
1	MSKU2513306 20/8'6/DRY	CY/SD	19-Dec-2011

* Service Contract Number:

* For proper application of your funds, include a copy of your Maersk invoice(s) or bill of lading number(s) with your payment.
For electronic payments, please forward your remittance information via email to NAMFRCSVCACH@maersk.com.

* Bank: Bank of America

Account Information:

Wire Only- ABA: 026009593
ACH Only- ABA: 111000012

Account: 4426928403
Account: 4426928403

EXHIBIT "D"



**MAERSK
LINE**

Maersk Agency U.S.A., Inc.
9300 Arrowpoint Boulevard
Charlotte NC 28273-8136

IMPORT INVOICE Number: 5245874657

* If paying by check, please remit payment to:

Maersk Line
Attention: Payment Services - 3rd Floor South
9300 Arrowpoint Blvd
Charlotte, NC 28273-8136

* PCD = Price Calculation Date is the date on which Maersk Line or one of its authorised agent(s) takes possession of the last container listed on the Bill of Lading. Pursuant to the Maersk Line tariff and applicable law on this invoice Maersk Line charges the rates that were in effect (via contract or Tariff as applicable) on the Price Calculation Date.

* For more information on our surcharges, please visit our website at www.maerskline.com / Services / List of Services, surcharges and fees



MAERSK LINE

Maersk Agency U.S.A., Inc.
9300 Arrowpoint Boulevard
Charlotte NC 28273-8136

Original DETENTION INVOICE Number: 5246493800

Bill-to Party :	A1 SPECIALIZED SERVICES PO Box 270 CROYDON PA 19021	Invoice Date:	12-19-2012
		Due Date:	12-19-2012
		Payment terms:	Payable immediately
Attention of:	DET/DEM ACCOUNTS PAYABLE	Our Contact:	Wanda Crawford
On behalf of :	A1 SPECIALIZED SERVICES PO Box 270 CROYDON PA 19021	Our Telephone:	1-8776999444
Customer No:	USS4018333		

Maersk Agency U.S.A., Inc. as agent for carrier A.P. Moller Maersk A/S
Esplanaden 50, DK 1098 Copenhagen K, Denmark.
Trading under the name Maersk Line with below VAT number:
DK53139655 - applicable for exports to or imports from EU shipment (transactions not reported on EC Sales List)
DK12559410 - applicable for intra-EU or outside EU shipment (transactions reported on EC Sales List)

Total Amount Due			
Condition	Rate	Base Value	Total(USD)
Net value			2,470.00
0% Non EU services VAT	0.00 %	2,470.00	0.00
Amount Due			2,470.00

Bill of Lading Number: 555708766

Origin	Destination	Vessel	Voyage
	Place of Delivery: Croydon		

Description	Container	Type	Start	End	Qty	UoM	ROE	Total(USD)
Freetime			01-19-2012	01-25-2012	7			
Detention	MSKU2513306	20 DRY	01-26-2012	07-16-2012	1	CNT	1.00000	21,345.00
Adjustment								-18,875.00
Tier 1: 7 Days x \$85.00 = \$595.00								
Tier 2: 166 Days x \$125.00 = \$20750.00								
Loc: NWKSL - Line: M3								
Billable Days: 173								
Total Due:								2,470.00

* Service Contract Number:
* Credit cards are now being accepted for demurrage and detention payments
Demurrage - Simply call the Maersk Release Team at 877-699-9444, option #1
Detention - Simply call the Maersk D&D Team at 877-699-9444, option #5

EXHIBIT "E"




MAERSK
LINE

Maersk Agency U.S.A., Inc.
9300 Arrowpoint Boulevard
Charlotte NC 28273-8136

DETENTION INVOICE Number: 5246493800

* Electronic payments:
* For proper application of your funds, include a copy of your Maersk invoice(s) or bill of lading number(s) with your payment.
For electronic payments, please forward your remittance information via email to NAMFRCSVACH@maersk.com.
* Bank: Bank of America
Account Information:
Wire Only- ABA: 026009593 Account: 4426928403
ACH Only- ABA: 111000012 Account: 4426928403
Type of Account: Customer Connections Account
* If paying by check, please remit payment to:
Maersk Agency U.S.A., Inc.
Attention: Payment Services - 3rd Floor South
9300 Arrowpoint Blvd
Charlotte, NC 28273-8136

 MAERSK LINE		NON-NEGOTIABLE WAYBILL		SCAC MAEU B/L No. 863752096
Shipper AWADA TRADING CO. BAALBECK-LEBANON TEL: 03-815426 FAX: 08-374588		Booking No. 863752096		
Consignee A1 SPECIALIZED SERVICES&SUPPLIES.inc, CROYDON,PA 19021,USA 2707 STATE ROAD.CROYDON 19021 PA TEL:215-788-9200 FAX:215-788-9222		Export references Svc Contract 593955		
Notify Party JOHN A STEER & COMPANY 331 MAIN STREET METUCHEN NJ 088040 TEL: 73-220-58283 FAX: 73-220-58328		This contract is subject to the terms and conditions, including the law & jurisdiction clause and limitation of liability & declared value clauses, of the current Maersk Line Bill of Lading (available from the carrier, its agents and at www.maerskline.com), which are applicable with logical amendments (mutatis mutandis). To the extent necessary to enable the Consignee to sue and to be sued under this contract, the Shipper on entering into this contract does so on his own behalf and as agent for and on behalf of the Consignee and warrants that he has the authority to do so. The shipper shall be entitled to change the Consignee at any time before delivery of the goods provided he gives the Carrier reasonable notice in writing. Delivery will be made to the Consignee or his authorised agent on production of reasonable proof of identity (and, in the case of an agent, reasonable proof of authority) without production of this waybill. The Carrier shall be under no liability whatsoever for misdelivery unless caused by the Carrier's negligence.		
		Onward inland routing (Not part of Carriage as defined in clause 1. For account and risk of Merchant)		
Vessel CAP HARVEY	Voyage 214N	Place of Receipt. Applicable only when document used as Multimodal Waybill		
Port of Loading Beirut	Port of Discharge Newark	Place of Delivery. Applicable only when document used as Multimodal Waybill Croydon		

PARTICULARS FURNISHED BY SHIPPER

Kind of Packages; Description of goods; Marks and Numbers; Container No./Seal No. 1 Container Said to Contain 4500 PCS SCRAP AUTOMOTIVE CATALYTIC CONVERTERS FOR MELTING PURPOSE ONLY. N/M MSKU7721600 ML-LB0076752 20 DRY 8'6 4500 PCS 14800.000 KGS 25.0000 CBM SHIPPER'S LOAD, STOW, WEIGHT AND COUNT FREIGHT PREPAID CY/SD	Weight 14800.000 KGS	Measurement 25.0000 CBM
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Above particulars as declared by Shipper, but without responsibility of or representation by Carrier.

Freight & Charges Multi Stop Service Total USD	Rate	Unit	Currency USD USD	Prepaid	Collect 683.00 683.00
Carrier's Receipt. Total number of containers or packages received by Carrier. 1 container		Place of Issue of Waybill Beirut		Shipped, as far as ascertained by reasonable means of checking, in apparent good order and condition unless otherwise stated herein the total number or quantity of Containers or other packages or units indicated in the box opposite entitled "Carrier's Receipt"	
Shipped on Board Date (Local Time) 2012-04-08		Date Issue of Waybill 2012-04-20			
Declared Value Charges (see clause 7.3 of the Maersk Line Bill of Lading) for Declared Value of US\$					
Signed for the Carrier A.P. Moller - Maersk A/S trading as Maersk Line					
Maersk Lebanon sarl As Agent(s) for the Carrier					

EXHIBIT 11



MAERSK LINE

Maersk Agency U.S.A., Inc.
9300 Arrowpoint Boulevard
Charlotte NC 28273-8136

Original

IMPORT INVOICE Number: 5245934961

Bill-to Party : A1 SPECIALIZED SERVICES PO Box 270 CROYDON PA 19021 Attention of: ACCOUNTS PAYABLE On behalf of : A1 SPECIALIZED SERVICES PO Box 270 CROYDON PA 19021	Invoice Date: 07-27-2012 Due Date: 07-27-2012 Payment terms: Payable immediately Our Contact: Wanda Crawford Our Telephone: 1-800-768-8714
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Customer No: USS4018333

Maersk Agency U.S.A., Inc. as agent for carrier A.P. Moller Maersk A/S
Esplanaden 50, DK 1098 Copenhagen K, Denmark.
Trading under the name Maersk Line with below VAT number:
DK53139655 - applicable for exports to or imports from EU shipment (transactions not reported on EC Sales List)
DK12559410 - applicable for intra-EU or outside EU shipment (transactions reported on EC Sales List)

Total Amount Due

Condition	Rate	Base Value	Total(USD)
Net value			683.00
0% Non EU services VAT	0.00 %	683.00	0.00
Amount Due			683.00

Bill of Lading Number: 863752096

POL: Beirut	Place of Receipt: Beirut	Vessel/Voyage: MAERSK VIRGINIA/1204
POD: Newark	Place of Delivery: Croydon	
ETD: 08-Apr-2012	ETA: 30-Apr-2012	

Description of Charges	Qty	UoM	Curr	Unit Price	ROE	Total(USD)
Multi Stop Service	1.000	BKG	USD	683.00	1.00000	683.00
Total Due:						683.00

No	Container No	Service	PCD
1	MSKU7721600 20/8'6/DRY	CY/SD	31-Mar-2012

* Service Contract Number: 593955

* For proper application of your funds, include a copy of your Maersk invoice(s) or bill of lading number(s) with your payment.
For electronic payments, please forward your remittance information via email to NAMFRCSVCACH@maersk.com.

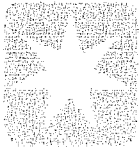
* Bank: Bank of America

Account Information:

Wire Only- ABA: 026009593
ACH Only- ABA: 111000012

Account: 4426928403
Account: 4426928403

EXHIBIT "G"



MAERSK
LINE

Maersk Agency U.S.A., Inc.
9300 Arrowpoint Boulevard
Charlotte NC 28273-8136

IMPORT INVOICE Number: 5245934961

* If paying by check, please remit payment to:

Maersk Line
Attention: Payment Services - 3rd Floor South
9300 Arrowpoint Blvd
Charlotte, NC 28273-8136

* PCD = Price Calculation Date is the date on which Maersk Line or one of its authorised agent(s) takes possession of the last container listed on the Bill of Lading. Pursuant to the Maersk Line tariff and applicable law on this invoice Maersk Line charges the rates that were in effect (via contract or Tariff as applicable) on the Price Calculation Date.

* For more information on our surcharges, please visit our website at www.maerskline.com / Services / List of Services, surcharges and fees



MAERSK

LINE

Maersk Agency U.S.A., Inc.
9300 Arrowpoint Boulevard
Charlotte NC 28273-8136

Original

DETENTION INVOICE Number: 5245997992

Bill-to Party : A1 SPECIALIZED SERVICES
PO Box 270
CROYDON PA 19021

Invoice Date: 08-14-2012
Due Date: 08-14-2012

Payment terms: Payable immediately

Attention of: DET/DEM ACCOUNTS PAYABLE
On behalf of : A1 SPECIALIZED SERVICES
PO Box 270
CROYDON PA 19021

Our Contact: Wanda Crawford
Our Telephone: 1-800-768-8714

Customer No: USS4018333

Maersk Agency U.S.A., Inc. as agent for carrier A.P. Moller Maersk A/S
Esplanaden 50, DK 1098 Copenhagen K, Denmark.
Trading under the name Maersk Line with below VAT number:
DK53139655 - applicable for exports to or imports from EU shipment (transactions not reported on EC Sales List)
DK12559410 - applicable for intra-EU or outside EU shipment (transactions reported on EC Sales List)

Total Amount Due			
Condition	Rate	Base Value	Total(USD)
Net value			10,220.00
0% Non EU services VAT	0.00 %	10,220.00	0.00
Amount Due			10,220.00

Bill of Lading Number: 863752096

Origin	Destination	Vessel	Voyage
	Place of Delivery: Newark		

Description	Container	Type	Start	End	Qty	UoM	ROE	Total(USD)
Freetime			05-02-2012	05-07-2012	6			
Detention	MSKU7721600	20 DRY	05-08-2012	07-30-2012	1	CNT	1.00000	10,220.00
Tier 1: 7 Days x \$85.00 = \$595.00								
Tier 2: 77 Days x \$125.00 = \$9625.00								
Loc: NWKSL - Line: M1 - Contract: 593955								
Billable Days: 84								

Total Due: 10,220.00

* Service Contract Number:

* For proper application of your funds, include a copy of your Maersk invoice(s) or bill of lading number(s) with your payment.
For electronic payments, please forward your remittance information via email to NAMFRCSVACH@maersk.com.

* Bank: Bank of America

EXHIBIT "H"



MAERSK
LINE

Maersk Agency U.S.A., Inc.
9300 Arrowpoint Boulevard
Charlotte NC 28273-8136

DETENTION INVOICE Number: 5245997992

Account Information:

Wire Only- ABA: 026009593

ACH Only- ABA: 111000012

Account: 4426928403

Account: 4426928403

* If paying by check, please remit payment to:

Maersk Line

Attention: Payment Services - 3rd Floor South

9300 Arrowpoint Blvd

Charlotte, NC 28273-8136